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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CARLA PETERSON,
14 Defendant.

Case No. 2:19-cr-00119-JAD-NJK

FOURTH STIPULATION TO
MODIFY PRETRIAL RELEASE
CONDITIONS¹

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16 IT IS HEREBY STIPULATED AND AGREED, by and between United States Attorney
17 Nicholas A. Trutanich and Assistant United States Attorney Christopher Burton, counsel for the
18 United States of America, and Federal Public Defender Rene L. Valladares and Assistant Federal
19 Public Defender Sylvia Irvin, counsel for Carla Peterson, that Ms. Peterson's release condition
20 requiring a third-party custodian be removed for the following reasons:

21 1. On June 6, 2019, Ms. Peterson made her initial appearance and was released on a
22 personal recognizance bond with conditions including that Ms. Peterson's brother-in-law act as
23 her third-party custodian. *See* ECF No. 13 at 6, Additional Condition of Release, Supervision
24 Condition (6).

25 2. At a January 30, 2020 hearing, a personal recognizance bond imposed the same
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¹ This motion is timely filed. There is no deadline for the filing of this motion.

1 conditions. *See* ECF No. 35 at 3, Additional Conditions of Release, Supervision Condition (8).

2 3. Since February 20, 2020, Ms. Peterson has been participating in the RISE Court
3 program. *See* ECF Nos. 40-41. As a RISE Court participant, Ms. Peterson must abide by pretrial
4 release conditions and to her RISE Court contract. *See* ECF No. 41. Ms. Peterson continues to
5 be in good standing in RISE Court and is compliant with all of her conditions.

6 4. Undersigned counsel previously asked the Court to modify Ms. Peterson's travel
7 restrictions to allow her to travel for work and for family reasons, and this Court granted the
8 modifications. ECF Nos. 64-68 73-74. Notably, Ms. Peterson maintained compliance with her
9 pretrial conditions during this travel.

10 5. In light of her compliance with her pretrial release conditions and her good
11 standing in the RISE Court, counsel asks the Court to remove the third-party custodian condition
12 and remove Ms. Peterson's brother-in-law as her third-party custodian. Given Ms. Peterson's
13 compliance for nearly a year, this pretrial condition is no longer needed. Additionally, counsel
14 notes that Ms. Peterson's sister and brother-in-law are divorcing and this condition will add
15 unnecessary stress to Ms. Peterson's situation.

16 6. Undersigned defense counsel consulted with the Pretrial Services Officer Samira
17 Barlow, and she agrees with the removal of the third-party custodian condition.

18 7. Defense counsel and Government counsel agree to the removal of the third-party
19 custodian condition.

20 8. Ms. Peterson continues to be in compliance with her pretrial release conditions.

21
22 DATED this 2nd day of February, 2021.

23 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

24
25 */s/ Sylvia Irvin*
By _____
26 SYLVIA IRVIN
Assistant Federal Public Defender

/s/ Christopher Burton
By _____
CHRISTOPHER BURTON
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 CARLA PETERSON,
8

9 Defendants.

Case No. 2:19-cr-00119-JAD-NJK

ORDER

10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that following modifications shall be made to Ms.
12 Peterson's release conditions:

13 1. The third-party custodian condition imposed at ECF No. 13 at 6, Additional
14 Condition of Release, Supervision Condition (6), is removed as a pretrial release condition for
15 Ms. Peterson.

16 2. Mr. Kenneth Richard King, Jr. is removed as the third-party custodian in this
17 case.

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19 DATED this 3rd day of February, 2021.

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22 UNITED STATES MAGISTRATE JUDGE
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